

ARMCO

APPLICATION FOR EMPLOYMENT

Eastern Steel Division

Armco is an Equal Employment Opportunity Employer and as such meets all government regulations pertaining to Equal Employment Opportunity, including the annual development of Affirmative Action Programs.

Name DONALD KENT EDWARDS Date 4/12/89
FIRST MIDDLE LAST

Present Address: 910 8th AVE MIDDLETOWN OHIO 45244
NO. STREET CITY STATE ZIP CODE

Phone Number — or number where you can be reached: (513) 423-2882
AREA CODE NUMBER

Permanent Address: _____
NO. STREET CITY STATE ZIP CODE

Permanent Phone: (_____) _____ Social Security #: _____
AREA CODE NUMBER

Are you 18 years of age or older? ☒ Yes ☐ No

Are you lawfully entitled to work within the U.S.? YES
(PROOF OF CITIZENSHIP OR IMMIGRATION STATUS IS REQUIRED UPON EMPLOYMENT.)

I am an American Citizen <input checked="" type="checkbox"/>	Registered Alien <input type="checkbox"/>	Applying under Amnesty <input type="checkbox"/>	Other <input type="checkbox"/>
--	---	---	--------------------------------

Have you been convicted of a crime other than a minor traffic violation? No

If yes, explain. _____

Date available for employment: Today

If the job requires, are you willing to travel? YES Relocate? _____

If the job requires, are you able to work all shifts? YES

Have you previously applied at Armco? YES If "yes", when/where? 1988

Have you previously worked for Armco? YES If "yes", when/where? 1981 Summer Job

EDWARDS DONALD KENT
LAST NAME FIRST MIDDLE

DEFENDANT'S
EXHIBIT

EDWARDS-1

SEA 4-24-07

EDUCATIONAL BACKGROUND:

Circle last grade completed												College hours completed				
TYPE OF SCHOOL	NAME AND LOCATION											GRADUATED		FIELD OF STUDY	GRADE POINT or TOP, MID, BOT. 1/3	
		1	2	3	4	5	6	7	8	9	10	11	12			YES
HIGH	middle town												✓		Biology, Accounting	2.0
BUSINESS OR TRADE																
COLLEGE OR UNIVERSITY	Grambling State University Ruston, Louisiana													✓	Business Adm.	
POST GRADUATE																

List other formal educational experience (i.e.: night school; home study courses; GED; etc.):

If presently enrolled, indicate where and field of study:

Describe any definite plans for further study:

List significant activities, honors, awards or elective offices which have contributed to your career goals and interests:

MILITARY SERVICE: Are you a Veteran of the U.S. Military Service? ☐ Yes ☐ No

DATES OF ACTIVE OR RESERVE DUTY		BRANCH OF SERVICE	HIGHEST RANK OR RATE	TYPE OF DISCHARGE
FROM	TO			

Please, indicate any military experience or training you feel might be of interest and value to Armco:

EMPLOYMENT EXPERIENCE:**PRESENT OR LAST POSITION**

Name of Employer BARBARA PARK Convalescent Center

Address 751 Kensington Kind of Business Nursing Home

Describe your position Janitor

Period of employment (from) 10-88 (to) MO./YR. Name of person for whom you worked Linda Alfrey Rate of earnings 3.65

Give exact reason for leaving _____

NEXT PREVIOUS POSITION

Name of Employer Middletown Community Center

Address 800 Lafayette Ave. Kind of Business Recreation Center

Describe your position Janitor

Period of employment (from) 11-89 (to) 1-89 Name of person for whom you worked Jack Fitzpatrick Rate of earnings 3.50

Give exact reason for leaving MORE HOURS

NEXT PREVIOUS POSITION

Name of Employer _____

Address _____ Kind of Business _____

Describe your position _____

Period of employment (from) _____ (to) _____ Name of person for whom you worked _____ Rate of earnings _____

Give exact reason for leaving _____

NEXT PREVIOUS POSITION

Name of Employer _____

Address _____ Kind of Business _____

Describe your position _____

Period of employment (from) _____ (to) _____ Name of person for whom you worked _____ Rate of earnings _____

Give exact reason for leaving _____

How much time have you lost from work in the past two years? NONE

For what reasons? _____

JOB INTERESTS AND SKILLS:

For what particular type(s) of work are you making application: (such as Clerical, Technical, Engineering, plant, etc.)

LABORER OR ENGINEERINGExpected wage or salary \$ 10/Hr.If you have any condition (physical or mental) which may limit your performance in the type of work for which you are applying, you may want to describe such condition: NO

If applicable, please explain and describe any reasonable accommodation which would enable you to perform this job efficiently and safely: _____

Describe any experience or skills directly applicable to this work: _____

If applying for clerical work, show present job skill level. Include Typing (wpm); Shorthand (wpm); and any office machines or equipment you can operate: _____

If applying for sales; technical; professional; or administrative work, give highlights of any special training or experience which may be helpful: _____

If applying for plant work, indicate any training or experience which might be useful. Include any equipment or machinery you are able to operate: Buffing machineState any additional information you feel may be helpful to us in considering your application. DEPENDABLE WORKER**PERSONAL REFERENCES:**

Give names and addresses of three people whom we may contact for references.

William Edwards 4705 Bonita Dr. 425-0605LEROY EDWARDS 8921 Franklin-Trenton Rd 422-1923Chris Edwards 4705 Bonita Dr. 425-0605

The foregoing information is accurate and I authorize verification by Armco. I agree that any false or misleading statement in this application for employment or in any additional forms signed by me in connection with my employment shall be sufficient cause for refusal of or separation from employment.

I understand that this application is not and is not intended to be a contract of employment. I hereby authorize the company to make any investigation into my physical condition including Drug and Alcohol Abuse Screening applicable to the requirements of the type of work for which I am applying.

M. J. [Signature] 4/12/89 jl

Application received by: Date Received

Signature of Applicant Donald Edwards

APPLICATION FOR EMPLOYMENT**AK Steel Corporation**

AK Steel Corporation is an Equal Employment Opportunity Employer and as such meets all government regulations pertaining to Equal Employment Opportunity.

Name DONALD K. Edwards Date 8-23-99
FIRST MIDDLE LAST
 Present Address 718 TENTH AVE. Middletown DE 19044
NO. STREET CITY STATE ZIP CODE
 Phone Number — or number where you can be reached: (513) 423-2552
AREA CODE NUMBER
 Permanent Address: _____
NO. STREET CITY STATE ZIP CODE
 Permanent Phone: (_____) _____ Social Security # _____
AREA CODE NUMBER
 Are you 18 years of age or older? ☒ Yes ☐ No
 Are you lawfully entitled to work within the U.S.? yes
(PROOF OF CITIZENSHIP OR IMMIGRATION STATUS IS REQUIRED UPON EMPLOYMENT)
 Have you been convicted of a crime other than a minor traffic violation? no
 If yes, explain. _____
 Date available for employment: Anytime
 If the job requires, are you willing to travel? yes Relocate? yes
 If the job requires, are you able to work all shifts? yes
 Have you previously applied at Armco or AK Steel? yes If yes, when/where? 1981, 83, 92, 98
 Have you previously worked for Armco or AK Steel? yes If yes, when/where? 1981 for the
SUMMER

Edwards Donald K.
FIRST MIDDLE LAST

**DEFENDANT'S
EXHIBIT**

 EDWARDS 2
 Jla 4-24-07

EDUCATIONAL BACKGROUND:

Circle last grade completed												College hours completed	
1 2 3 4 5 6 7 8 9 10 11 (12)													
TYPE OF SCHOOL	NAME AND LOCATION	GRADUATED		DEGREE	FIELD OF STUDY	GRADE POINT/SCALE TOP MID BOT 1/3							
		YES	NO										
HIGH	Middletown High School	✓			Gen. Course	mid							
BUSINESS OR TRADE													
COLLEGE OR UNIVERSITY													
POST GRADUATE													

List other formal educational experience; e.g., night school, home study courses, GED, etc. _____

If presently enrolled, indicate where and field of study: _____

Describe any definite plans for further study: _____

List significant activities, honors, awards or elective offices which have contributed to your career goals and interests: _____

MILITARY SERVICE: Are you a Veteran of the U.S. Military Service? ☐ Yes ☒ No

BRANCH OF SERVICE	HIGHEST RANK OR RATE

Please, indicate any military experience or training you feel might be of interest and value to AK Steel: _____

EMPLOYMENT EXPERIENCE:**PRESENT OR MOST RECENT POSITION**Name of employer Fairfield Center Your title Med. Supply ClerkAddress 350 Kolb Dr. Kind of business Health CareDescribe your position Delivering supply to the homes, laundry & stockingPeriod of employment from 7-90 to Name of person for whom you worked Private home Rate of earnings 9.50
(MO/YR) (MO/YR)

Give exact reason for leaving _____

NEXT PREVIOUS POSITIONName of employer Midd. Reg. Hospital ^{Pratt + M} Your title FA. M. AssistantAddress 105 McKnight Dr Kind of business HospitalDescribe your position cleaning staffPeriod of employment from 11-98 to 8-1 Name of person for whom you worked Con Cress Rate of earnings 7.50
(MO/YR) (MO/YR)

Give exact reason for leaving _____

NEXT PREVIOUS POSITIONName of employer Midd Community Center ^{Pratt + M} Your title Health & RecreationAddress 800 Lincolnton Ave Kind of business RecreationDescribe your position General cleaningPeriod of employment from 11-85 to 10-97 Name of person for whom you worked Mr. Fitzpatrick Rate of earnings 4.72
(MO/YR) (MO/YR)

Give exact reason for leaving _____

NEXT PREVIOUS POSITION

Name of employer _____ Your title _____

Address _____ Kind of business _____

Describe your position _____

Period of employment from _____ to _____ Name of person for whom you worked _____ Rate of earnings _____
(MO/YR) (MO/YR)

Give exact reason for leaving _____

How much time have you lost from work in the past two years? _____

JOB INTERESTS AND SKILLS:

For what particular type of work are you making application; e.g., clerical, technical, engineering, professional, sales, labor, etc.

LABOR

Expected wage or salary \$ 10/hr

If applying for clerical work, list special skills. Include typing (wpm), word processing, computer software, and any office machines or equipment you can operate: _____

If applying for sales, technical, professional, or administrative work, give highlights of any special training or experience which may be helpful: _____

If applying for labor or craft work, indicate any training or experience which might be useful. Include any equipment or machinery you can operate: _____

Describe any additional qualifications, abilities, or strong points which will help you be successful in the job for which you are applying. _____

PERSONAL REFERENCES:

Please provide the following information on three individuals whom we may contact as references:

NAME	ADDRESS	TELEPHONE NO.	RELATIONSHIP
KIRBY EDWARDS	1105 BALTIMORE	493-4034	UNCLE
BRENDA ESTERKAMP	350 KOLB DR.	474-0423	BOSS
MR. FRITPATRICK	800 LAFAYETTE AVE	425-7866	BOSS

I hereby certify that the foregoing information is accurate, and I authorize AK Steel to verify it. I specifically authorize AK Steel Corporation to obtain information from my former employers and other references, and I authorize my former employers and other references to release information to AK Steel Corporation.

I agree that any false or misleading statement in this application for employment or any additional forms signed by me in connection with my employment shall be sufficient cause for refusal or termination of employment.

I understand that this application is not and is not intended to be a contract of employment. I agree to submit to a physical examination applicable to the requirements of the type of work for which I am applying, including drug and alcohol abuse screening.

Signature of Applicant David Edwards

8-23-79

Application received by Date received

APPLICANT SURVEY

Applicant Name: Donald EdwardsDate: 3-20-07

Item	Item	Response	
1.	Other than exiting the military, how many times have you been without employment for more than six weeks?		
2.	In the left column, list your full-time employers (company names) for the past 10 years and in the right column write the number of years in each job listed.	<u>Franklin...</u> 	<u>14 yrs</u>
3.	Have you ever been terminated from any employer?	<u>YES</u>	<u>NO</u>
4.	Do you have a high school diploma or GED?	<u>YES</u>	NO
5.	Do you have a valid driver's license?	<u>YES</u>	NO
6.	Do you have reliable transportation?	<u>YES</u>	NO
7.	Have you ever been convicted of a crime other than a minor traffic violation?	YES	<u>NO</u>
8.	Some positions are on weekly rotating shifts. Is this (A) Preferred, (B) Tolerable, or (C) Unacceptable	<u>A</u>	B C
9.	Have you ever worked for AK Steel before?	<u>YES</u>	NO
10.	How many years of assembly, heavy machinery, and/or manufacturing experience do you have?		
11.	Do you have experience in welding, electrical, maintenance, or plumbing?	<u>YES</u>	NO
12.	List any education beyond high school.		
13.	Have you served in the military? (Upon job offer, a copy of your DD-214 will be required)	YES	NO
14.	Have you ever worked rotating shifts for a previous employer?	YES	<u>NO</u>

DEFENDANT'S
EXHIBIT

EDWARDS - 3

2a 4-24-07

APPLICATION FOR EMPLOYMENT**AK Steel Corporation**

AK Steel Corporation is an Equal Employment Opportunity Employer and as such meets all government regulations pertaining to Equal Employment Opportunity.

Name Donald K. Edwards Date 8.28.00
FIRST MIDDLE LAST

Present Address 718 Tenth Avenue Middletown Ohio 45044
NO STREET CITY STATE ZIP CODE

Phone Number — or number where you can be reached: (513) 727-0519
AREA CODE NUMBER

Permanent Address: _____
NO STREET CITY STATE ZIP CODE

Permanent Phone: (_____) _____ Social Security # _____
AREA CODE NUMBER

Are you 18 years of age or older? ☒ Yes ☐ No

Are you lawfully entitled to work within the U.S.? yes
(PROOF OF CITIZENSHIP OR IMMIGRATION STATUS IS REQUIRED UPON EMPLOYMENT)

Have you been convicted of a crime other than a minor traffic violation? NO

If yes, explain. _____

Date available for employment: 2 weeks from hiring date

If the job requires, are you willing to travel? yes Relocate? _____

If the job requires, are you able to work all shifts? yes

Have you previously applied at Armco or AK Steel? yes If yes, when/where? August of 99'
unemployment office

Have you previously worked for Armco or AK Steel? yes If yes, when/where? June of 1981

Edwards Donald K.
LAST NAME FIRST MIDDLE

**DEFENDANT'S
EXHIBIT**
EDWARDS - 4
 200 4-24-07

EDUCATIONAL BACKGROUND:

Circle last grade completed												College hours completed			
1 2 3 4 5 6 7 8 9 10 11 12															
TYPE OF SCHOOL	NAME AND LOCATION	GRADUATED		DEGREE	FIELD OF STUDY	GRADE POINT/SCALE									
		YES	NO			TOP	MID	BOT 1/3							
HIGH	Middletown High	✓			management			mid							
BUSINESS OR TRADE															
COLLEGE OR UNIVERSITY															
POST GRADUATE															

List other formal educational experience; e.g., night school, home study courses, GED, etc. _____

N/A

If presently enrolled, indicate where and field of study: NODescribe any definite plans for further study: N/A ~~Regret~~

List significant activities, honors, awards or elective offices which have contributed to your career goals and interests: _____

MILITARY SERVICE: Are you a Veteran of the U.S. Military Service? ☐ Yes ☒ No

BRANCH OF SERVICE	HIGHEST RANK OR RATE

Please, indicate any military experience or training you feel might be of interest and value to AK Steel: _____

EMPLOYMENT EXPERIENCE:**PRESENT OR MOST RECENT POSITION**Name of employer FAIRFIELD Center Your title med. supply ClerkAddress 350 Kolb DR. Kind of business MRDDDescribe your position Delivering supply AROUND campus and ALSO stock supplyPeriod of employment from 7-90 to Name of person for whom you worked Brenda Esterkamp Rate of earnings 10.17
(MO/YR) (MO/YR)Give exact reason for leaving **NEXT PREVIOUS POSITION** PART-timeName of employer Midd. Comm. Center Your title Recreation leaderAddress 600 Lafayette Ave. Kind of business Describe your position WORKING with children in the communityPeriod of employment from 11-85 to 10-98 Name of person for whom you worked MR FRITZPATRICK Rate of earnings 5.72
(MO/YR) (MO/YR)Give exact reason for leaving **NEXT PREVIOUS POSITION** Summer JobName of employer ANCO Your title LABORERAddress CRAWFORD St. Kind of business FACTORYDescribe your position JANITOR WORKPeriod of employment from 6-81 to 9-81 Name of person for whom you worked Rate of earnings 10.25
(MO/YR) (MO/YR)Give exact reason for leaving Summer Job**NEXT PREVIOUS POSITION**Name of employer Your title Address Kind of business Describe your position Period of employment from to Name of person for whom you worked Rate of earnings
(MO/YR) (MO/YR)Give exact reason for leaving How much time have you lost from work in the past two years? 10 times

JOB INTERESTS AND SKILLS:

For what particular type of work are you making application; e.g., clerical, technical, engineering, professional, sales, labor, etc.

LABOR

Expected wage or salary \$ 10/hr & up

If applying for clerical work, list special skills. Include typing (wpm), word processing, computer software, and any office machines or equipment you can operate: _____

If applying for sales, technical, professional, or administrative work, give highlights of any special training or experience which may be helpful: _____

If applying for labor or craft work, indicate any training or experience which might be useful. Include any equipment or machinery you can operate: FORK lift

Describe any additional qualifications, abilities, or strong points which will help you be successful in the job for which you are applying.

Good worker and on time to do the job at hand

PERSONAL REFERENCES:

Please provide the following information on three individuals whom we may contact as references:

NAME	ADDRESS	TELEPHONE NO	RELATIONSHIP
Brenda Esterkamp	350 Kolb Dr.	874-0423	FRIEND
William Edwards	4705 Bonita Dr.	425-0605	BROTHER
Volia Hunter	923 Ninth Ave.	423-9571	FRIEND

I hereby certify that the foregoing information is accurate, and I authorize AK Steel to verify it. I specifically authorize AK Steel Corporation to obtain information from my former employers and other references, and I authorize my former employers and other references to release information to AK Steel Corporation.

I agree that any false or misleading statement in this application for employment or any additional forms signed by me in connection with my employment shall be sufficient cause for refusal or termination of employment.

I understand that this application is not and is not intended to be a contract of employment. I agree to submit to a physical examination applicable to the requirements of the type of work for which I am applying, including drug and alcohol abuse screening.

Signature of Applicant Donald Edwards

Application received by/Date received _____

APPLICANT SURVEY

Item	Item	Response	
1.	Other than exiting the military, how many times have you been without employment for more than six weeks?	N/A	
2.	In the left column, list your employers (company names) for the past 10 years and in the right column write the number of years in each job listed.	Fairfield Center _____ _____ _____ _____ _____	10 1/2 yrs. _____ _____ _____ _____ _____
3.	Have you ever been terminated from any employer?	YES	<u>NO</u>
4.	Do you have a high school diploma or GED?	<u>YES</u>	NO
5.	Do you have a valid driver's license?	<u>YES</u>	NO
6.	Do you have reliable transportation?	<u>YES</u>	NO
7.	Have you ever been convicted of a crime other than a minor traffic violation?	YES	<u>NO</u>
8.	Some positions are on weekly rotating shifts. Is this (A) Preferred; (B) Tolerable, or (C) Unacceptable?	<u>A</u>	B C
9.	Have you ever worked for AK Steel before?	<u>YES</u>	NO
10.	How many years of assembly, heavy machinery, and/or manufacturing experience do you have?	1 yr.	
11.	Do you have experience in welding, electrical, maintenance or plumbing?	YES	<u>NO</u>
12.	List any education beyond high school.	N/A _____ _____ _____ _____ _____	
13.	Have you served in the military? (Upon job offer, a copy of your DD-214 will be required?)	YES	<u>NO</u>
14.	Have you ever worked rotating shifts for a previous employer?	<u>YES</u>	NO

Donald Edwards
Applicant's Name (PRINT)

[REDACTED]
Social Security #

Donald Edwards
Signature

8.28.07
Date

**DEFENDANT'S
EXHIBIT**

EDWARDS-5

222 4-24-07

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

AGENCY

☐ FEPA
☐ EEOC

CHARGE NUMBER

State or local Agency, if any

and EEOC

NAME (Indicate Mr., Ms., Mrs.)

Donald K. Edwards

HOME TELEPHONE (Include Area Code)
(513) 727-0740

STREET ADDRESS

CITY, STATE AND ZIP CODE

712 17th Avenue, Middletown, Ohio 45044

DATE OF BIRTH

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

NUMBER OF EMPLOYEES, MEMBERS

TELEPHONE (Include Area Code)

A.K. Steel Company

703 Curtis Street, Middletown, Ohio 45043

(513) 683-5300

STREET ADDRESS CITY, STATE AND ZIP CODE

COUNTY

NAME

TELEPHONE NUMBER(include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☒ Race ☒ Color ☐ Sex ☐ Religion ☐ National Origin

☐ Retaliation ☐ Age ☒ Discrimination ☐ Other (Specify)

DATE DISCRIMINATION TOOK PLACE

earliest (ADEA/EPA) LATEST(ALL)

/ / August, 1999

☐ Continuing Action

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s)):

1. I am an African American male, age 39.
2. On or about August 1999, I submitted an application for employment with A.K. Steel in Middletown, Ohio. I was applying for entry level jobs. By reason of my background and prior work experience, I am fully qualified for an entry level or a laborer position.
3. To date I have received no response to my application.

☐ I also want this charge filed with the EEOC.

I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - (when necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

SIGNATURE OF COMPLAINANT

Donald Edwards

Date

2-28-2000

Charging Party (Signature)

Donald Edwards

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day, month, and year)

28-Feb-2000

Judy L. Brooks

JUDY L. BROOKS
Notary Public, State of Ohio
My Commission Expires Sept. 22, 2003

**DEFENDANT'S
EXHIBIT**

EDWARDS - 6

28-4-24-07

4. To the best of my information and belief, the job openings for which I applied were filled by Caucasian applicants with the same or lessor qualifications than mine.
5. I believe that A.K. Steel favors Caucasians over minorities in its hiring policies and practices. I believe I was not hired because A.K. Steel maintains a pattern and practice of discrimination against minority applicants at its Middletown, Ohio facility.

CHARGE - DISCRIMINATION

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

AGENCY

CHARGE NUMBER

☐ FEPA
☒ EEOC

221A00324

Ohio Civil Rights Commission

State or local Agency, if any

and EEOC

NAME (Indicate Mr., Ms., Mrs.)

Mr. Donald K. Edwards

HOME TELEPHONE (Include Area Code)

(513) 727-0740

STREET ADDRESS

CITY, STATE AND ZIP CODE

712 17th Avenue, Middletown, OH 45044

DATE OF BIRTH

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

A K STEEL

NUMBER OF EMPLOYEES, MEMBERS

Cat D (501 +)

TELEPHONE (Include Area Code)

(513) 683-5300

STREET ADDRESS

CITY, STATE AND ZIP CODE

703 Curtis Street, Middletown, OH 45043

COUNTY

017

NAME

TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☒ RACE☐ COLOR☐ SEX☐ RELIGION☐ NATIONAL ORIGIN☐ RETALIATION☐ AGE☐ DISABILITY☐ OTHER (Specify)DATE DISCRIMINATION TOOK PLACE
EARLIEST LATEST

08/30/1999 08/30/1999

☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s)):

I. On or around August 9, 1999 I submitted a written application to this employer for an entry level position. As of March 9, 2000 I have not been hired. I have information that since I applied White individuals with comparable or less qualifications than me have been hired.

II. No reason has been given for why I have not been hired.

III. I believe that I have been discriminated against because of my race, Black, in violation of Title VII.



STACEY M. ECKHARDT-CURTIS
Notary Public, State of Ohio
My Commission Expires Jan. 2, 2001

RECEIVED
CINCINNATI
JUN 10 2000

DEFENDANT'S
EXHIBIT

EDWARDS - 7
na 4-24-07

Stacey M. Eckhardt-Curtis

☒ I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the foregoing is true and correct.

NOTARY - (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

Donald Edwards

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(Month, day and year)

4.6.2000

Date

Charging Party (Signature)

APPLICATION FOR EMPLOYMENT

Eastern Steel Division

Armco is an Equal Employment Opportunity Employer and as such meets all government regulations pertaining to Equal Employment Opportunity, including the annual development of Affirmative Action Programs.

OSD 8/26/81
SUD - quit 9/25/81

EDWARDS Donald KENT
LAST NAME FIRST MIDDLE

Name DONALD KENT EDWARDS Date JAN 7 1988
FIRST MIDDLE LAST

Present Address: 1714 S. VERITY PKWY MIDDLE OH 45024
NO STREET CITY STATE ZIP CODE
910 8th Ave

Phone Number — or number where you can be reached: (513) 423-2332
AREA CODE NUMBER

Permanent Address: _____
NO STREET CITY STATE ZIP CODE

Permanent Phone: (_____) _____ Social Security #: _____
AREA CODE NUMBER

Are you 18 years of age or older? ☒ Yes ☐ No

Are you lawfully entitled to work within the U.S.? YES
(PROOF OF CITIZENSHIP OR IMMIGRATION STATUS IS REQUIRED UPON EMPLOYMENT)

I am an American Citizen <input checked="" type="checkbox"/>	Registered Alien <input type="checkbox"/>	Applying under Amnesty <input type="checkbox"/>	Other <input type="checkbox"/>
--	---	---	--------------------------------

Have you been convicted of a crime other than a minor traffic violation? NO

If yes, explain. _____

Date available for employment: Anytime

If the job requires, are you willing to travel? YES Relocate? _____

If the job requires, are you able to work all shifts? YES

Have you previously applied at Armco? YES If "yes", when/where? DEC. 1983

Have you previously worked for Armco? YES If "yes", when/where? JUNE 1981
Machine Shop

**DEFENDANT'S
EXHIBIT**

EDWARDS 8

4-24-07

EDUCATIONAL BACKGROUND:Circle last grade completed 1 2 3 4 5 6 7 8 9 10 11 12 College hours completed

TYPE OF SCHOOL	NAME AND LOCATION	GRADUATED		FIELD OF STUDY	GRADE POINT or TOP, MID, BOT. 1/3
		YES	NO		
HIGH	MIDDLETOWN 1980	✓		BUSINESS	2.0
BUSINESS OR TRADE					
COLLEGE OR UNIVERSITY					
POST GRADUATE					

List other formal educational experience (i.e.: night school; home study courses; GED; etc.):

If presently enrolled, indicate where and field of study: _____

Describe any definite plans for further study: _____

List significant activities, honors, awards or elective offices which have contributed to your career goals and interests:

MILITARY SERVICE: Are you a Veteran of the U.S. Military Service? ☐ Yes ☐ No

DATES OF ACTIVE OR RESERVE DUTY		BRANCH OF SERVICE	HIGHEST RANK OR RATE	TYPE OF DISCHARGE
FROM	TO			

Please, indicate any military experience or training you feel might be of interest and value to Armco:

EMPLOYMENT EXPERIENCE:

PRESENT OR LAST POSITION

Name of Employer Midd. Community CenterAddress 800 Lafayette AveKind of
BusinessDescribe your position JanitorPeriod of
employment (from) 11-87 (to) 1-99
(MO. YR.) (MO. YR.)Name of person for
whom you worked MR. FRITZPATRICKRate of
earnings 3.35Give exact
reason for leaving

NEXT PREVIOUS POSITION

Name of Employer U.B.S.Address CincinnatiKind of
BusinessDescribe your position General CleanerPeriod of
employment (from) 1984-10-87 (to) 10-87
(MO. YR.) (MO. YR.)Name of person for
whom you worked PAUL BRAYRate of
earnings 3.35Give exact
reason for leaving Laid-off / quit

NEXT PREVIOUS POSITION

Name of Employer ARMCO

Address

Kind of
BusinessDescribe your position JanitorPeriod of
employment (from) 10-81 (to) 10-81
(MO. YR.) (MO. YR.)Name of person for
whom you worked MR. SCHWARTZBAUGHRate of
earnings 10/hr.Give exact
reason for leaving termination & I was called back

NEXT PREVIOUS POSITION

Name of Employer No Work From 1981 - 84 -

Address

Kind of
Business

Describe your position

Period of
employment (from) (to)
(MO. YR.) (MO. YR.)Name of person for
whom you workedRate of
earningsGive exact
reason for leaving

How much time have you lost from work in the past two years?

1 yr.For what reasons? NO WORK

JOB INTERESTS AND SKILLS:

For what particular type(s) of work are you making application: (such as Clerical, Technical, Engineering, plant, etc.)

LABOR

Expected wage or salary \$

10/hr.

If you have any condition (physical or mental) which may limit your performance in the type of work for which you are applying, you may want to describe such condition:

If applicable, please explain and describe any reasonable accommodation which would enable you to perform this job efficiently and safely:

Describe any experience or skills directly applicable to this work:

BUFFING MACHINE

If applying for clerical work, show present job skill level. Include Typing (wpm); Shorthand (wpm); and any office machines or equipment you can operate:

If applying for sales; technical; professional; or administrative work, give highlights of any special training or experience which may be helpful:

If applying for plant work, indicate any training or experience which might be useful. Include any equipment or machinery you are able to operate: BUFFER, WAX, & STRIPPING

State any additional information you feel may be helpful to us in considering your application.

PERSONAL REFERENCES:

Give names and addresses of three people whom we may contact for references.

William Edwards 4705 Bonita Dr. 425-0605MR. JACK FRITZpatrick 800 Lafayette Ave 425-7366Kirby Edwards 1105 Baltimore St. 423-4034 -

The foregoing information is accurate and I authorize verification by Armco. I agree that any false or misleading statement in this application for employment or in any additional forms signed by me in connection with my employment shall be sufficient cause for refusal of or separation from employment.

I understand that this application is not and is not intended to be a contract of employment. I hereby authorize the company to make any investigation into my physical condition including Drug and Alcohol Abuse Screening applicable to the requirements of the type of work for which I am applying.

RTS 1/28/88

Signature of Applicant

Dennis Edwards

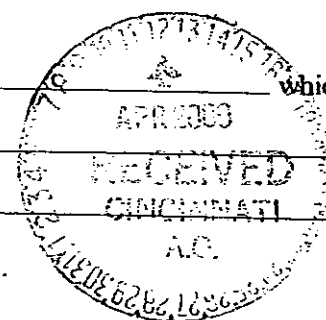
Application received by: /Date Received

STATE OF OHIOCASE NAME Edwards vs A K STEELCITY/COUNTY OF Middletown/ButlerCASE NUMBER 221A00324**AFFIDAVIT**I, Donald K. Edwards being first duly sworn upon my oath affirm and hereby say:
(Name)

I have been given assurances by an Agent of the U.S. Equal Employment Opportunity Commission that this Affidavit will be considered confidential by the United States Government and will not be disclosed as long as the case remains open unless it becomes necessary for the Government to produce the affidavit in a formal proceeding. Upon the closing of this case, the Affidavit may be subject to disclosure in accordance with Agency policy.

I am 39 years of age, my gender is Male and my racial identity is Black.
(sex) (race)I reside at 712 17th Avenue
(Number/Street)City of Middletown, County of ButlerState of OH, Zip Code 45044My telephone number is (including area code) (513) 727-0740My statement concerns A K STEEL which is
(Name of Union/Company/Agency)located at 703 Curtis Street
(Number/Street)in Middletown OH 45043
(City) (State) (Zip)My job classification is (If applicable) Entry Level
(job title)My immediate supervisor is (If applicable) _____
(Name) (job title)

I am a Black male. In 1980 after graduating from high school I worked for a summer as an employee at this steel manufacturer. I worked as a laborer doing janitorial work. Since it was only a summer job I had to reapply for full time permanent work. I did so later that year but I was never hired supposedly because there was a lay off. But I felt at that time that racial bias kept me from being hired. More recently on or around August 9, 1999 I submitted a written application for an entry level position. I saw advertisements in the local paper for entry level openings and also my brother's brother-in-law, Lenon Hunter (who works there) told him that the company was hiring. I was never interviewed or tested as a result of my August application. In September, 1999 on the advise of my attorney's office, I spoke with someone in the personnel office (name unknown) I was told by the female I spoke with that they had my application and if they were going to hire me they would contact me. Meanwhile as recently as late August into October, 1999 my wife (who works in a nursing home) was hearing from several employees there that they were leaving that job because they were being hired by A K Steel. These were all White individuals in their late teens and early twenties. The names of some of them were Jason (last name unknown), and Gary Jones(?). None of these individuals had any more experience than me and in all likelihood they had less than me. My brother's brother-in-law also told my brother that Whites were

**DEFENDANT'S
EXHIBIT**EDWARDS 926 4-24-07D. E. Page 1 of _____
(initials)

STATE OF OHIO
 CITY/COUNTY OF Middletown/Butler

CASE NAME Edwards vs A K STEEL
 CASE NUMBER 221A00324

AFFIDAVIT (cont.)

being hired during the fall of 1999. As of March 28, 2000 I have not been contacted in any form by this company regarding a job and I believe that this is because I am Black. As remedy I am seeking a position with this company and backpay and seniority as well as attorney fees and damages as appropriate.

I have read and had an opportunity to correct this Affidavit consisting of _____ handwritten ☐
 typed ☐ pages and swear that these facts are true and correct to the best of my knowledge and belief.

Dan Edwards

Subscribed and sworn to before me

this 14th day of April, 2000

Stacey M. Eckhardt-Curtis



STACEY M. ECKHARDT-CURTIS
 Notary Public, State of Ohio
 My Commission Expires Jan. 2, 2001

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

AGENCY

CHARGE NUMBER

☐ FEPA
☒ EEOC

221A200687

Cincinnati Area Office

and EEOC

State or local Agency, if any

NAME(Indicate Mr., Ms., Mrs.)

Mr. Donald Edwards

HOME TELEPHONE (Include Area Code)

(513) 705-6322

STREET ADDRESS

CITY, STATE AND ZIP CODE

DATE OF BIRTH

801 Crawford St.

Middletown, OH 45408

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

NUMBER OF EMPLOYEES, MEMBERS

TELEPHONE (Include Area Code)

AK Steel

>20

1-800-331-5050

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

703 Curtis Street

Middletown, Ohio 45043

NAME

TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☒ RACE ☒ COLOR ☐ SEX ☐ RELIGION ☐ AGE
☐ RETALIATION ☐ NATIONAL ORIGIN ☐ DISABILITY ☐ OTHER (Specify)

DATE DISCRIMINATION TOOK PLACE
EARLIEST (ADEA/EPA) LATEST (ALL)

January 2002

☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

EEOC, CINCINNATI AREA OFFICE

JUL 09 2002

RECEIVED

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

NOTARY - (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(Day, month, and year)

Date June 28, 2002 Charging Party (Signature) *Donald Edwards*

EEOC FORM 5 (10/94)

**DEFENDANT'S
EXHIBIT**
EDWARDS 10
JUL 4-24-07

CHARGE OF DISCRIMINATION**DONALD EDWARDS****PAGE 1****I. Overview of Individual and Class Allegations**

AK Steel Corporation has discriminated and continues to discriminate against me in the terms and conditions of my application for employment with them on the basis of my race, African-American, by denying me the opportunity to be hired while hiring equally or less qualified white applicants and subjecting me to a racially hostile application process and other forms of discrimination. I believe that AK Steel Corporation's actions are part of a continuing pattern and practice of discrimination against African-American applicants for employment, including but not limited to, denying applicants hiring opportunities while providing such opportunities to equally or less qualified white applicants and subjecting them to a racially hostile application process.

II. Statement of Personal Harm

I applied to do general labor at the AK Steel plant in Middletown, Ohio in January 2002. It was approximately the seventh time I had applied. I found out that AK Steel was hiring from the ads they ran in the paper and on cable TV. My work experience consists of doing manual labor, such as mowing the fields along the sides of Ohio highways, for the Ohio Department of Transportation (ODOT). I have also worked for twelve years at the Fairfield Center for Mental Retardation as a medical supply clerk delivering supplies to the different facilities there. In addition, I have a high school diploma. I filled out an application at Palmer Temp, an organization that handles hiring for AK Steel, and never heard back from either them or AK Steel. In previous applications, such as one in August 2001, I took an aptitude test and was interviewed by a white male Palmer Temp representative. The AK Steel exam included easy questions on simple math, common sense (such as, which weighs more: 500 lbs. of water or 500 lbs. of steel? Obviously they weigh the same), and basic questions on weights and measures. The interviewer asked similar questions. At that time, the Palmer Temp representative told me that they would send my application in to AK Steel and I would be called regardless of whether they wanted to hire me or not. I never heard anything back from them in August 2001, though; and I never heard anything back from them when I reapplied in January 2002. I am currently employed by ODOT, for whom I have been doing manual labor for approximately one month.

III. Statement of Discrimination

I believe that AK Steel Corporation has discriminated against me and continues to discriminate against me in the terms and conditions of my applications for employment with them on the basis of my race, African-American, in violation of the Civil Rights Act of 1964, as amended, because white applicants with fewer qualifications than me have been hired and I have not, and because I have been subjected to a racially hostile application process and other forms of discrimination and denied the right to apply for work in an environment free of racial discrimination.

**CHARGE OF DISCRIMINATION
DONALD EDWARDS
PAGE 2**

I have been adversely affected by these discriminatory practices by being deprived of the equal opportunity to be hired. Such discrimination denies me and other African-Americans the right to be hired for positions for which we are qualified.

This systemic discrimination also adversely affects the status of African-Americans as employees by promoting and reinforcing racial stereotypes and bias in hiring.

IV. Statement of Classwide Discrimination on the Basis of Race

Based on my experiences, I believe that AK Steel Corporation has engaged and continues to engage in a pattern and practice of discrimination against its African-American applicants for employment that denies them equal employment opportunities in ways including but not limited to the following: denying them hiring opportunities while providing such opportunities to equally or less qualified white employees and subjecting them to a racially hostile application process. This policy violates Title VII of the 1964 Civil Rights Act, 42 U.S.C. Section 2000(e), et seq.

I believe this policy has effected a class of African-American persons comprised of all past, present and future African-American applicants for employment with AK Steel. I believe that these discriminatory practices occur throughout AK Steel Corporation. I make this charge on behalf of myself and all similarly situated African-American applicants for employment.

I declare under penalty of perjury that the foregoing is true and correct.

Date: * 6/28/02

* Donald Edwards

Charging Party (signature)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

VIVIAN BERT, et al.,)	
)	
Plaintiffs,)	
)	
v.)	CASE NO. C-1-02-467
)	Judge Beckwith
AK STEEL CORPORATION,)	Magistrate Judge Hogan
)	
Defendant.)	

**PLAINTIFF DONALD EDWARDS' ANSWERS TO THE
DEFENDANT'S FIRST SET OF INTERROGATORIES**

Comes now the Plaintiff, Donald Edwards, by and through his undersigned counsel of record and responds to the Defendant's First Set of Interrogatories as follows:

GENERAL OBJECTIONS

1. The Plaintiff objects to the definitions and instructions accompanying these interrogatories to the extent that they seek to impose burdens, duties and obligations upon the Plaintiff in excess of or different from those imposed by applicable law and the Federal Rules of Civil Procedure; Plaintiff will respond in accordance with said law and rules.

2. The Plaintiff objects to these requests to the extent they seek information and/or documentation regarding matters about which the Defendant has knowledge but has failed to disclose, or so limited their responses to previous discovery of the Plaintiff, so as to in effect deny the Plaintiff the information requested and needed by them to answer these requests.

3. The Plaintiff objects to these requests to the extent they seek to discover "core" work product, including the disclosure of the mental impressions, conclusions, opinions, and/or legal theories of

**DEFENDANT'S
EXHIBIT**

EDWARDS- 11
216 4-24-07

attorneys or other representatives of the Plaintiff, rather than seeking this information from the Plaintiff.

4. The Plaintiff objects to these requests to the extent they seek information and/or documentation protected by the attorney-client privilege or any other applicable privilege.

5. The Plaintiff objects to these requests to the extent that the Defendant is seeking to make them into a bill of particulars.

6. The Plaintiff objects to these requests to the extent they seek to require Plaintiff's counsel to present a "dress rehearsal" of the evidence to be submitted in the course of the proceedings. The mental impressions, legal theories, legal conclusions, and legal opinions of Plaintiff's counsel, as well as any communications between Plaintiff and her counsel, are clearly protected from discovery by the attorney-client privilege and the work product doctrine.

7. The Plaintiff objects to these requests to the extent that the information and/or documentation sought, if any, was obtained and prepared in anticipation of litigation and the Defendants have not made the required showing of substantial need for the information and/or documentation or that the substantial equivalent of such information and/or documentation is unobtainable by other means. The Plaintiff further objects to these requests to the extent that the information and/or documentation called for, if any, is protected and is not discoverable under Rule 26(b)(3) of the Fed. R. Civ. P. and Hickman v. Taylor, 329 U.S. 495 (1947).

8. The Plaintiff objects to these requests to the extent that they seek information and/or documentation that is equally available to the Defendant and the burden on the Defendant to obtain the requested information and/or documentation is no greater than the burden on the Plaintiff.

9. The Plaintiff objects to these requests to the extent they exceed the requirements of Rules

26, 30, 34 or 45 of the Fed. R. Civ. P.

10. The Plaintiff objects to these requests to the extent they seek information and/or documentation relating to expert witnesses, witnesses, and trial exhibits in excess of the disclosure duties imposed by the Fed. R. Civ. P. and the Court's Scheduling and Pretrial Orders relating to such matters.

11. The Plaintiff objects to these requests to the extent they require the Plaintiff to disclose "each and every" fact or piece of knowledge possessed by them as such a requirement is impossible to fulfill and is objectionably broad for failure to be "reasonably particularized".

12. The Plaintiff objects to these requests to the extent they request duplicative and cumulative information and/or documentation heretofore disclosed in conjunction with discovery already undertaken by the Defendant in this action.

13. The Plaintiff objects to these requests to the extent that they seek to require the Plaintiff's attorneys to divulge the substance of information and/or documentation developed by them (i.e., interpretive, not investigatory) in preparation for any hearing or trial in this action.

14. The Plaintiff objects to these requests to the extent that they do not, on their face, restrict themselves either to an identifiable time or a reasonable, rationally-based time frame.

15. The Plaintiff objects to these requests to the extent that they seek information and/or documentation from the Plaintiff regarding matters about which the Defendant has refused or objected to providing in their interrogatory or request for production responses.

16. The Plaintiff objects to these requests to the extent that they are oppressive, i.e., they were designed to create an unreasonable burden on the Plaintiff which burden is not commensurate with the professed result sought.

17. The Plaintiff objects to these interrogatories to the extent they seek answers to multiple interrogatories within a single interrogatory.

18. These requests are addressed to the Plaintiff and the responses herein are based on information and/or documentation presently available to the Plaintiff. Investigation is presently continuing, however, and additional information and/or documentation pertinent to these requests may well be disclosed as a result of such ongoing and continuing investigation.

Except as otherwise indicated, the Plaintiff incorporates the General Objections into each and every answer set forth below. Without waiving the foregoing objections, the Plaintiff answers as follows:

INTERROGATORY NO. 1: Identify all litigation or legal proceedings in which you have been a witness or party, including the name and number of the case, the court or administrative agency for which the case was pending, and a brief description of the nature of the case, and the year in which the matter was pending.

SPECIFIC OBJECTION TO REQUEST: Plaintiff objects because this request does not seek relevant information or that information subject to production under Fed. R. Civ. P. 26, and thus, this request is unduly harassing, burdensome, and oppressive. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

ANSWER: Bert, et al, v. AK Steel
Case No.: 1:02-CV-00467
United States District Court
Southern District of Ohio (Cincinnati)
Nature of case: Race discrimination in hiring

Bankruptcy - Approximately 1997

EEOC Charge against the Palmer Group for retaliation for participating in litigation

against AK Steel.

INTERROGATORY NO. 2: Identify all employers for whom you have worked since January 1, 2001, including the dates of employment, the positions held, amounts paid per week, and reason for leaving, if applicable.

SPECIFIC OBJECTION TO REQUEST: Plaintiff objects because this request does not seek relevant information or that information subject to production under Fed. R. Civ. P. 26, and thus, this request is unduly harassing, burdensome, and oppressive. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

ANSWER: October 2000 to March 2001 - Krogers; Night Clerk; \$284; Reason for leaving: Not enough hours.

February 2002 to December 2004 - Ohio Department of Transportation; Highway work; \$300/wk.

March 2006 to May 2006 - Lund International; Machine Operator; \$250/wk.

May 2006 to September 2006 - Kroger; Night Clerk; \$240/wk.

September 2006 to Present - Middle Community Center; Janitor; \$180/wk.

INTERROGATORY NO. 3: Identify all employers to whom you applied for employment since January 1, 2001, including the date you submitted written applications, the job to which you applied, the dates you were interviewed, the employers who tendered you job offers, and a description of the offer.

SPECIFIC OBJECTION TO REQUEST: Plaintiff objects because this request does not seek relevant information or that information subject to production under Fed. R. Civ. P. 26, and thus, this

request is unduly harassing, burdensome, and oppressive. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

ANSWER: February 2002 - Ohio Department of Transportation; Highway work;
March 2006 - Lund International; Machine Operator;
May 2006 - Kroger; Night Clerk; and
September 2006 - Middle Community Center; Janitor.

INTERROGATORY NO. 4: Identify all income received from whatever source, by amount each week after January 1, 2001.

ANSWER: October 2000 to March 2001 - Krogers; \$284;
February 2002 to December 2004 - Ohio Department of Transportation;\$300/wk.
March 2006 to May 2006 - Lund International; \$250/wk.
May 2006 to September 2006 - Kroger; \$240/wk.
September 2006 to Present - Middletown Community Center;\$180/wk.

INTERROGATORY NO. 5: Identify by name, address and telephone number all individuals who have knowledge about or information about the allegations in the Complaint, and state a summary of what you believe their knowledge to be.

ANSWER: None at this time.

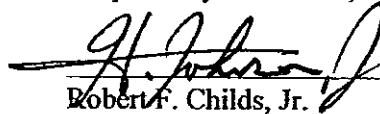
INTERROGATORY NO. 6: Identify all individuals who you intend to call as witnesses in the litigation of this matter.

SPECIFIC OBJECTION TO REQUEST: Plaintiffs objects because this Interrogatory violates

the Court's Order establishing a deadline for Plaintiff to disclose witnesses and testimony. Plaintiff further objects to the extent this interrogatory seeks information protected by the attorney-client privilege or other privilege and/or the work product doctrine. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

ANSWER: Plaintiff will abide by the deadlines established by the Court and the disclosure requirements set by the Federal Rules of Civil Procedure to disclose the witnesses they will use at trial in this case.

Respectfully Submitted,



Robert F. Childs, Jr.

Herman N. Johnson, Jr.

WIGGINS, CHILDS, QUINN & PANTAZIS

The Kress Building

301 19th Street North

Birmingham, Alabama 35203

(205) 328-0640

(205) 254-1500 (facsimile)

Tobias, Kraus & Torchia, LLP

414 Walnut Street

Suite 911

Cincinnati, Ohio 45202

(513) 241-8137

(513) 241-7863 (facsimile)

ATTORNEYS FOR THE PLAINTIFFS

CERTIFICATE OF SERVICE

I do hereby certify that on April 23, 2007, I served the foregoing via U.S. Mail and electronic mail upon the following:

Gregory Parker Rogers
Lawrence James Barty
Patricia Anderson Pryor
Taft, Stettinius & Hollister, LLP
1800 First Star Tower
425 Walnut Street
Cincinnati, OH 45202
Fax: (513) 381-0205


PLAINTIFFS' COUNSEL

VERIFICATION

I, Donald Edwards hereby state that the answers to the foregoing interrogatories are true and complete to the best of my knowledge.



Donald Edwards

This the 20 day of April, 2007.

FROM :

FAX NO. :5137056322

Apr. 20 2007 03:47PM P2

H&R Block

advantage*Donald Edwards***CONFIDENTIAL****2003 Tax Return Summary****Federal Year over Year Comparison**

INCOME	Year 2003	Year 2002	Change(\$)
Wages, salaries, tips	\$11,068	\$18,295	
Unemployment compensation	\$634	\$0	(\$7,227)
Total income	\$11,702	\$18,295	\$634
			(\$6,593)
ADJUSTED GROSS INCOME			
Total income less total adjustments	\$11,702	\$18,295	(\$6,593)
TAXABLE INCOME			
Standard deductions	\$7,000	\$6,900	\$100
Exemptions	\$9,150	\$6,000	\$3,150
Taxable income	\$0	\$5,395	(\$5,395)
TAX COMPUTATION			
Income tax	\$0	\$538	(\$538)
Tax before credits	\$0	\$538	(\$538)
CREDITS			
Child tax credit	\$0	\$538	(\$538)
Total credits	\$0	\$538	(\$538)
PAYMENTS			
Federal withholding	\$972	\$1,598	(\$626)
Earned income credit	\$4,204	\$1,746	\$2,458
Additional child tax credit	\$57	\$62	(\$5)
Total payments	\$5,233	\$3,406	\$1,827
REFUND			
Overpayment	\$5,233	\$3,406	\$1,827
Refund due	\$5,233	\$3,406	\$1,827
OTHER COMPUTATIONS			
Alternative minimum taxable income	\$11,702	\$18,295	(\$6,593)
Marginal tax bracket	0%	10%	
Effective tax bracket	0%		
Filing status	Head of Household	Head of Household	

An H&R Block Tax Professional is available year-round to provide you with information about these opportunities.

For more information about tax, mortgage and financial services call 1-800-HRBLOCK or visit hrblock.com.

This H&R Block Advantage document presents suggestions that may help you improve your tax and financial situation. Its contents should be considered in conjunction with other information you receive from qualified sources that are familiar with your specific circumstances. Personal investment advice and financial planning services are available from H&R Block Financial Advisors, Inc., a registered broker/dealer and registered investment advisor, member NYSE/SIPC. H&R Block, Inc. and its tax preparation subsidiaries are not registered broker/dealers and not registered investment advisors. Mortgage services are available from H&R Block Mortgage Corporation.

FROM :

FAX NO. : 5137056322

Apr. 20 2007 03:44PM P1

*Donald Edwards***Advantage****CONFIDENTIAL****2004 Tax Return Summary****Federal Year over Year Comparison**

INCOME	Year 2004	Year 2003	Change(\$)
Wages, salaries, tips	\$7,313	\$11,068	(\$3,755)
Taxable pensions	\$2,670	\$0	\$2,670
Unemployment compensation	\$5,632	\$634	\$4,998
Total income	\$15,615	\$11,702	\$3,913

ADJUSTED GROSS INCOME

Total income less total adjustments	\$15,615	\$11,702	\$3,913
-------------------------------------	----------	----------	---------

OTHER TAXES

Tax on IRA and other plans	\$267	\$0	\$267
Total tax	\$267	\$0	\$267

PAYMENTS

Federal withholding	\$853	\$972	(\$119)
Earned income credit	\$2,930	\$4,204	(\$1,274)
Additional child tax credit	\$0	\$57	(\$57)
Total payments	\$3,783	\$5,233	(\$1,450)

REFUND

Overpayment	\$3,516	\$5,233	(\$1,717)
Refund due	\$3,516	\$5,233	(\$1,717)

OTHER COMPUTATIONS

Alternative minimum taxable income	\$15,615	\$11,702	\$3,913
Filing status	Head of Household	Head of Household	

An H&R Block Tax Professional is available year-round to provide you with information about these opportunities. For more information about tax, mortgage and financial services call 1-800-HRBLOCK or visit hrblock.com.

This H&R Block Advantage document provides suggestions that may help you improve your tax and financial situation. Its contents should be considered in conjunction with information you receive from other sources that are familiar with your specific circumstances. H&R Block Financial Advisors, Inc., a subsidiary of H&R Block Inc. offers investment services and securities products. H&R Block Financial Advisors, Inc. is a dually-registered investment advisor and broker-dealer and a member of NYSE/SIPC. Tax services offered through subsidiaries of H&R Block Services Inc. Mortgage services offered through H&R Block Mortgage Inc., H&R Block Inc., H&R Block Services Inc. and H&R Block Mortgage Inc. are not registered broker-dealers.

FROM :

FAX NO. :5137056322

Apr. 20 2007 03:46PM P1

*Donna Edwards***CONFIDENTIAL****H&R Block
ADVANTAGE****2005 Tax Return Summary****Federal Year over Year Comparison****INCOME**

	Year 2005	Year 2004	Change(\$)
Wages, salaries, tips	\$8,883	\$7,313	\$1,570
Taxable pensions	\$0	\$2,670	(\$2,670)
Unemployment compensation	\$2,344	\$5,632	(\$3,288)
Total income	\$11,227	\$15,615	(\$4,388)

ADJUSTED GROSS INCOME

Total income less total adjustments	\$11,227	\$15,615	(\$4,388)
-------------------------------------	----------	----------	-----------

OTHER TAXES

Tax on IRA and other plans	\$0	\$267	(\$267)
Total tax	\$0	\$267	(\$267)

PAYMENTS

Federal withholding	\$249	\$853	(\$604)
Earned income credit	\$3,550	\$2,930	\$620
Total payments	\$3,799	\$3,783	\$16

REFUND

Overpayment	\$3,799	\$3,516	\$283
Refund due	\$3,799	\$3,516	\$283

OTHER COMPUTATIONS

Alternative minimum taxable income	\$11,227	\$15,615	(\$4,388)
Filing status	Head of Household	Head of Household	

An H&R Block Tax Professional is available year-round to provide you with information about these opportunities. For more information about tax, mortgage and financial services call 1-800-HRBLOCK or visit hrblock.com.

This H&R Block Advantage document provides suggestions that may help you improve your tax and financial situation. Its contents should be considered in conjunction with information you receive from other sources that are familiar with your specific circumstances. H&R Block Financial Advisors, Inc., a subsidiary of H&R Block Inc. offers investment services and securities products. H&R Block Financial Advisors, Inc. is a duly-registered investment advisor and broker-dealer and a member of NYSE/FIPC. Tax services offered through subsidiaries of H&R Block Services Inc. Mortgage services offered through H&R Block Mortgage Inc. H&R Block Inc., H&R Block Services Inc. and H&R Block Mortgage Inc. are not registered broker-dealers.

FROM :

FAX NO. : 5137056322

Apr. 20 2007 03:45PM P2

*David Edwards***H&R Block**
ADVANTAGE®**CONFIDENTIAL****H&R BLOCK****2006 Tax Return Summary****Federal Year over Year Comparison****INCOME**

	Year 2006	Year 2005	Change(\$)
Wages, salaries, tips	\$3,947	\$8,883	(\$4,936)
Business income(loss)	\$2,125	\$0	\$2,125
Unemployment compensation	\$0	\$2,344	(\$2,344)
Total Income	\$6,072	\$11,227	(\$5,155)

ADJUSTMENTS

Self-employed tax deduction	\$150	\$0	\$150
Total adjustments	\$150	\$0	\$150

ADJUSTED GROSS INCOME

Total income less total adjustments	\$5,922	\$11,227	(\$5,305)
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OTHER TAXES

Self-employment tax	\$300	\$0	\$300
Total tax	\$300	\$0	\$300

PAYMENTS

Federal withholding	\$0	\$249	(\$249)
Earned Income credit	\$2,370	\$3,550	(\$1,180)
Total payments	\$2,420	\$3,799	(\$1,379)

REFUND

Overpayment	\$2,120	\$3,799	(\$1,679)
Refund due	\$2,120	\$3,799	(\$1,679)

OTHER COMPUTATIONS

Alternative minimum taxable income	\$5,922	\$11,227	(\$5,305)
Filing status	Head of Household	Head of Household	

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